

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

RAJENDRA D. BADGAIYAN, M.D.,

Plaintiff,

v.

ANTHONY J. PRINCIPI, Secretary,  
Department of Veterans Affairs;  
President and Fellows of  
HARVARD COLLEGE; and GRACE J.  
MUSHRUSH, M.D.,

Defendants.

---

Civil Action No.  
04-12031-JLT

**THE DEPARTMENT OF VETERANS AFFAIRS'**  
**MOTION FOR LEAVE TO EXCEED 20 PAGES**

Now comes the defendant, Anthony J. Principi, Secretary of the Department of Veterans Affairs, by and through his attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, and moves this Court for Leave to Exceed 20 pages in his Memorandum in Support of his Motion for Summary Judgment. As grounds for this Motion the defendant Principi states as follows:

1. The plaintiff's complex Complaint of discrimination consists of eight (8) counts;
2. Many of the plaintiff's allegations do not provide the Court with the jurisdictional basis for the allegations;
3. The defendant Principi attempted to succinctly provide the Court with his legal arguments against many of the unsupported jurisdictional claims being made by the

plaintiff, but was unable to maintain the overall Memorandum in Support of his Motion for Summary Judgment at or under 20 pages;

4. The defendant Principi submits that the additional pages will assist this Court in understanding and adjudicating the issues raised by the plaintiff in his Complaint.

WHEREFORE, based on the numerous claims raised by the plaintiff within the Complaint, the defendant Principi moves this Court for Leave to Exceed 20 pages in his Memorandum in Support of his Motion for Summary Judgment.

Respectfully submitted,

MICHAEL J. SULLIVAN  
UNITED STATES ATTORNEY

By: /s/ Rayford A. Farquhar  
Rayford A. Farquhar  
Assistant U.S. Attorney  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617)748-3284

**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on September 29, 2006.

/s/ Rayford A. Farquhar  
Rayford A. Farquhar

**CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)**

Pursuant to Local Rule 7.1(A)(2), on September 29, 2006 I attempted to reach Attorney Gregory R. Barison to inform him that I was filing this Motion for Leave to Exceed 20 Pages, but he had left for the day.

/s/ Rayford A. Farquhar  
Rayford A. Farquhar  
Assistant U.S. Attorney